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Colorado Department
of Public Health
and Environment

January 10, 2001

Mr. Joe Legare
US DOE RFCA Coordinator
US Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

Re: Building 771 Closure Project Decommissioning Operations Plan Modification 3 and Proposed Action Memorandum for Under Building Contamination Remediation

Dear Mr. Legare:

Following are the comments from the Colorado Department of Public Health and Environment on the Building 771 Closure Project Decommissioning Operations Plan Modification 3 and Proposed Action Memorandum for Under Building Contamination Remediation dated October 31, 2000.

Three significant portions of this Decommissioning Operations Plan will not be approved by the Hazardous Materials and Waste Management Division. The first is the use of explosives to drop the stack, the second is the D&D of the tunnels, and the third is the Environmental Restoration section qualifying as a Proposed Action Memorandum. Additional details are included in our comments.

To date, comments from the US EPA have not been received. Additional comments from the US EPA may be submitted separately within the very near future.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

Denise M. Onyskiw
CDPHE 771/774 Project Manager

cc: Mark Aguilar, EPA
Dyan Foss, KH
Chris Gilbreath, KH
Dan Miller, AGO
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1/4
DOCUMENT CLASSIFICATION
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ADMIN RECORD
IA-B771-A-000128

Comments on 771 DOP Mod 3

Executive Summary Remove the sentence "This modification satisfies the notification requirements of the RSOPs (throughout the document, but particularly in Section 5.4, and 5.5).

Section 4 The parties to RFCA are in the process of negotiating a final list. Section 4 will be modified, as appropriate, when they reach agreement on the final list.

Section 4.1.1.2 Section should describe current uncertainty on radionuclide cleanup standards and not list them as if agreed to by all parties.

Section 5 Change the sentences in the first paragraph to "In such cases, planned activities may be revised without revising the CPB or DOP, if the activities are still within the scope of this DOP and the referenced RSOPs *consistent with RFCA and the DPP*. Notable changes will be shared with the LRA and stakeholders as part of the RFCA consultative process."

Section 5.2.2 Cites completion of a RLCR for 771. DOP should not; the RLCR does not meet current standards from the applicable RSOP, being based on historical knowledge only.

Section 5.3.2 Remove the sentence "Some miscellaneous equipment may remain in the Areas after decontamination, component removal, and size reduction because it meets the unrestricted release criteria, and there is no reason to remove it." This interferes with the ability to perform a good final survey. Walls and floors must be bare to do a good survey of the building shell.

Section 5.4.2, Area AG, Tunnels and Stack This section will not be approved because enough information on water balance is not available yet.

Section 5.4.4 Include the following requirement: "A readiness assessment will be required before D&D of the infinity room and state representatives will be participants in the RA."

Section 5.5 Move the second paragraph, beginning "The demolition phase..." to the beginning of the section. Change the sentence in the (now second) paragraph to "The actual sequence and methods used may differ from what is indicated in this section; as long as the activity is within the scope of the *RSOP for Facility Disposition and consistent with the RFCA and the DPP*, there will be no modification to the DOP."

Section 5.5.1.8 Final surveys cannot be done on the building shell until the UBC is gone. Address how the interior building shell will be protected from remaining in-ground contamination during demolition.

Section 5.5.1.8 State how this will not interfere with environmental characterization and how much plutonium may be missed and left in the ground due an inadequate characterization

Section 5.5.2 This section will not be approved because the stack is not clean.

Section 5.5.3 This section will not be approved because not enough information is yet known about water balance.

Section 5.6 While it is commendable to create a tie-in between ER and D&D activities, not enough information is available to approve this section as a PAM

Section 5.6 The third sentence of the first paragraph of Section 5.6 states that this DOP/PAM addresses the process waste lines under the referenced buildings. This conflicts with the next sentence, which says that IHSSs (e.g., IHSS 121) will not be part of the scope. The

second paragraph in this section states that the original process waste lines (IHSS 121) will not be included in this action.

Section 5.6.1 The version reviewed has added Building 771C to the 3 other buildings covered by this DOP. This building should therefore be added to the last paragraph of Section 5.6 and addressed throughout the remaining sections. The total number of buildings should be raised to 4 in the second paragraph of Section 5.6. Alternatively, the first paragraph of Section 5.6 could explain that since this is a small addition to Building 771, all discussions of Building 771 will be assumed to cover Building 771C issues as well.

Section 5.6.1 In the latest version, two sentences have been added to the second paragraph of Section 5.6.1. These limits to removal actions may be reasonable to consider, but as stated they allow broad latitude for restricting remediation.

PAMs or other interim remedial action decision document typically include sections on alternatives evaluation/alternatives analysis, environmental evaluation, performance monitoring and air monitoring in addition to the subjects covered by this DOP. These are suggestions for future documents.

Section 5.6.3 The second paragraph in Section 5.6.3 is probably more appropriate in Section 5.6.2. This discussion should also consider post-remediation conditions that may affect groundwater/containment flow such as rubble-filled basements/excavations, removal of footing drains, etc.

Contrary to the third paragraph in Section 5.6.3, the draft IA SAP identifies potential COCs as "all analytes detected during previous studies in the IA and generally include the following analytical suites: Target Compound list (organics), Target Analyte List, radionuclides (RFETS-specific)." This long list can be refined using "site-specific analytical data and process knowledge." The list in Table 6 is presumptively short. It should include metals (see Section 3.1) and chemicals (and their degradation products) known to have been used at these buildings.

The footnote at the bottom of Table 6 refers to the use of hypothetical values derived by using the sum-of-ratios method. To be complete, the footnote needs to add, "...in a Am-241/Pu-239 activity ratio of 0.18."

Section 5.6.3 The paragraph after Table 6 states an expectation that only Am and Pu will be found to be COCs at Building 770. This statement appears to conflict with Section 5.6.4.1, which anticipates VOCs as well.

Section 5.6.4 The first paragraph in Section 5.6.4 mentions that concrete slabs will be "appropriately dispositioned." If the disposition of these slabs will be purview of ER, then considerably more detail needs to be added to describe how they will be "appropriately dispositioned."

Section 5.6.4.2 Most of the text of Section 5.6.4.2 seems more appropriate to include in Section 5.6.4.4. Section 5.6.4.3 could be re-titled, "Proposed Action."

Section 5.6.4.3 The fourth paragraph in Section 5.6.4.3 describes verification sampling/surveying, a topic that should warrant more detail and its own subsection. This paragraph should mention the sampling location and frequency, or state that these will be based on guidance in the IASAP. The referenced table should be Table 6. The final sentence in this paragraph (and Section 5.6.4.1) needs to be carefully considered. RFCA states that for interim remedial actions, interim cleanup levels will equal Tier I action levels. Prior ER projects that have been guided by these levels are in locations that would allow them to be re-addressed should the final Comprehensive Risk Assessment and CAD/ROD require it. UBC removals, however, must be considered more final and therefore, care must be taken to ensure that actions based on the upper limit of the CERCLA risk range are protective.

Section 5.6.4.4 The third paragraph of Section 5.6.4.4 does not sufficiently explain how soils with contamination levels between Tier I and Tier II will be "evaluated for return to the excavation." RFCA states that, "put-back levels decisions should be made and explained within the decision documents associated with those actions." This is beyond the scope of this DOP.

Section 5.6.6 The first sentence of Section 5.6.6 does not account for the evaluation of soils between Tier I and Tier II mentioned in the third paragraph of Section 5.6.4.4. This section should clarify and explain the statement in Section 5.6.4.2 that soils destined for off-site disposal "will be placed into appropriate waste containers." The waste management by the Materials Stewardship Project must be sufficient to cover RCRA waste management issues.

While a specific schedule calendar is not necessary, and estimate of the duration of important elements of the UBC portion of this project is.